



An ED&F Man
Company

August 16, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
So., Ag Stop 0268
Washington, DC 20250

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Dear Mr. Neal and National Organic Standards Board:

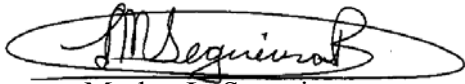
This letter is in reference to the National Organic Program, Sunset Review, and Docket number TM-04-07. Corigins Inc. supports the continued allowance of the following substance(s):

Name of Substance	Location on National List (i.e. 205.605(a))	Reason for continued allowance.	Supporting Documents (example: research data or other international organic programs)
Calcium Hydroxide	205.605(b)(3)	Explanation follows.	See (EEC) 2092/91 Regulation
Enzymes	205.605(a)		
Ascorbic acid	205.605(b)		

Calcium Hydroxide or Hydrated lime is a natural substance extracted from quicklime a natural resource found on earth, by a physical separation process. It is used as a processing aid in many applications throughout the organic industry, more specifically, it is used as a precipitant and pH adjuster in the production of organic sugar, one of the few ingredients that are certified organic and approved as a sweetener. The precipitate (mud cake) is then composted and is sent to the field as a soil amendment. Therefore, this processing aid should be allowed for use in the organic production.

We would also express our concern that a natural substance is classified as a synthetic by the USDA due only to the definition applied by USDA: any non-agricultural substance is classified as synthetic. Clearly, this applied definition ignores the fact that there exist in nature certain products that are indeed natural, but not “agricultural”. As to the remaining processing aids in the national list, they should be left as is, since they have been through a rigorous evaluation by the NOSB and are consistent with the OFPA regulations. The NOSB should be working to clarify the definition process of substances to include the correction of the misapplied definitions by the USDA.

Sincerely,

A handwritten signature in black ink, appearing to read 'M Sequeira', enclosed within a hand-drawn oval.

Marlon L. Sequeira
Director of Operations

Cc: Organic Trade Association
National Organic Standards Board

Attachment: “Evaluation Criteria for Substances Added to the National List”

http://www.ams.usda.gov/nop/Newsroom/SunsetDocFedReg06_05.pdf

http://europa.eu.int/eur-lex/en/consleg/pdf/1991/en_1991R2092_do_001.pdf.